

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC.,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:17-cv-00454-GKF-JFJ
	)	
1) CASTLE HILL STUDIOS LLC	)	
(d/b/a CASTLE HILL GAMING);	)	
2) CASTLE HILL HOLDING LLC	)	
(d/b/a CASTLE HILL GAMING); and	)	
3) IRONWORKS DEVELOPMENT, LLC	)	
(d/b/a CASTLE HILL GAMING)	)	
	)	
Defendants.	)	

**DECLARATION OF GARY M. RUBMAN IN SUPPORT OF PLAINTIFF’S  
OPPOSITION TO DEFENDANTS’ MOTION IN LIMINE TO  
EXCLUDE EVIDENCE AND ARGUMENT REGARDING  
COMMUNICATIONS BETWEEN COUNSEL AND CHG EMPLOYEES**

1. I am an attorney with the law firm of Covington & Burling LLP, counsel for Plaintiff Video Gaming Technologies, Inc. (“VGT”). I was admitted *pro hac vice* in this case on August 9, 2017.

2. Attached as **Exhibit B** is a true and correct copy of excerpts from the transcript of the deposition of Alan Roireau, taken on August 1, 2018.

3. Attached as **Exhibit C** is a true and correct copy of a document titled “VGT Severance and Release Agreement,” which is signed by Alan Roireau and dated November 6, 2011.

4. Attached as **Exhibit D** is a true and correct copy of a document titled “Employment Agreement,” which is signed by Jason Sprinkle and dated April 3, 2006.

5. Attached as **Exhibit E** is a true and correct copy of a document titled “Employee Agreement,” which is signed by Paul Suggs and dated December 30, 2003.

6. Attached as **Exhibit F** is a true and correct copy of a document titled “Associate Confidentiality and Intellectual Property Agreement,” which is signed by Brandon Booker and dated May 4, 2012.

7. Attached as **Exhibit G** is a true and correct copy of an email chain between counsel for VGT and CHG, with the most recent email dated March 23, 2018.

8. Attached as **Exhibit H** is a true and correct copy of excerpts from the transcript of the deposition of Todd Schoettelkotte, taken on September 22, 2018.

9. Attached as **Exhibit I** is a true and correct copy of excerpts from the transcript of the deposition of Brandon Booker, taken on July 10, 2018.

10. Attached as **Exhibit J** is a true and correct copy of excerpts from the transcript of the deposition of Jason Sprinkle, taken on May 18, 2018.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2018 in Washington, D.C.



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Gary M. Rubman

**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2018, I filed a copy of the foregoing via ECF,  
which caused service to be effected on the following counsel for Defendants:

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/s/ Gary M. Rubman